

CLEARY | GIACOBBE | ALFIERI | JACOBS LLC

BRUCE W. PADULA, Partner  
bpadula@cgajlaw.com

Reply to: Matawan Office

**Via Regular Mail**

Honorable Michael A. Shipp  
US District Court for the District of New Jersey  
402 E State St, Room 2020  
Trenton, New Jersey 08608

Re: Michael Battista et al. v. The Borough of Beach Haven  
Case No.: 3:24-c-07111-MAS-RLS

Dear Judge Shipp:

This letter is submitted to the Court in accordance with its instructions that the parties meet and confer regarding a briefing schedule for the above-referenced matter. The parties respectfully submit the following proposed schedule for the Court's consideration and approval:

**June 25, 2024:**

Defendant's motion for preliminary restraints prohibiting Teen Nights against Plaintiff Marlin due

**July 5, 2024:**

Defendant's opposition and cross-motion to Plaintiffs' application due

**July 19, 2024:**

Plaintiffs' opposition to any defense motions due  
Plaintiffs' reply to Defense opposition to application due.

**July 26, 2024:**

Defendants reply to Plaintiff's opposition to any motions due.


Thank you for your consideration.

Respectfully submitted,

/s/ Bruce W. Padula  
BRUCE W. PADULA  
BWP/gm

c: Arnold C. Lakind, Esq.  
Kevin Riordan, Esq.

**SO ORDERED** on this 25th day of June 2024,



MICHAEL A. SHIPP  
UNITED STATES DISTRICT JUDGE